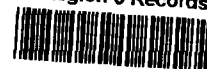


M E M O R A N D U M

EPA Region 5 Records Ctr.



393324

DATE: October 6, 1987

TO: Glenn Savage

FROM: Mike Grant ^{mdg}

SUBJECT: 1190400006 - Madison Co. - Granite City/Reilly Tar & Chemical Co.
ILD006278360
~~RCRA~~-FOS

The purpose of this memo is to request that the following situation be referred to the appropriate unit so it will be properly addressed.

On the morning of July 28, 1987, the facility had a release of creosote (U051) in the rail loading and unloading area. Tom Powell visited the facility on that afternoon and determined the following had occurred. A rail car being used to store creosote was being pumped into a storage tank. However, upon pumping, the valve did not seat properly and the entire load was released (approximately 6,500 to 7,000 gallons), some of which ran off-site. Sumps were dug to recover as much as possible.

On August 6, 1987, Tom Powell and myself returned to the subject facility to observe what remedial action had occurred to date. Upon arrival, we were met by Larry Pirtle, Plant Manager, Bill Justin, Director Environmental Control, and Al Buechanan, Plant Superintendent. The reason for our visit was to observe the off-site area which had been excavated as well as observe the area within the facility. We told the Reilly representatives that some further excavation was needed off-site. There was also a question of whether the railroad tracks where the spill occurred had to be removed. Mr. Powell and myself agreed that the tracks must be removed and the area beneath excavated. A discussion then ensued about the clean-up. The Reilly representatives said that clean-up to visual contamination is virtually impossible and sampling for detectable contamination would be ridiculous. Upon observation, this seemed to be the case. Mr. Justin said since the facility is closing the surface impoundment and overflow area under RCRA, and the facility is establishing a ground water corrective action program, that this may be the appropriate way to address the spill. At the time of this inspection, Reilly representatives estimated that 160 cubic yards of contaminated soil had been removed and that 1520 gallons of creosote was recovered from the spill.

On October 2, 1987, I revisited the site to check on the status of the spill. I met with Mr. Pirtle. Through discussions it was determined that 1040 cy. had already been shipped to Peoria Disposal. The railroad tracks and the fence had been removed and approximately 450 cubic yards of contaminated soil was remaining on-site. The off-site area appeared to be in good shape. Also, a large amount of contamination observed previously had been removed in the area where the tracks existed. Mr. Pirtle told me that once clean-up was completed, that an incident report would be filed. Mr. Pirtle showed me the drawings of the proposed new loading and unloading area. A concrete containment system will be constructed with a 20,000 gallon capacity to prevent any future situations like this one. Reilly Tar is awaiting an answer from the IEPA as to how this situation will now be handled. Since the

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1190400006
Granite City
Reilly Tar & Chemical Co.

-2-

October 6, 1987

unloading and loading operations have been disrupted, Reilly is anxious to install the new loading facility before winter. The facility has been in operation since 1910 and minor spills are likely to have occurred in the past. It should be noted that Mr. Pirtle stated he felt all the creosote spilled on July 28, 1987 had been removed. However, it would be impossible to determine the interface between the incident of July 28, 1987 and existing contamination from spills which have occurred throughout the years from day to day operations. Establishing clean-up levels would be useless as they would be unattainable in this area. Therefore, I request that this situation be referred to Compliance Monitoring and the Permit Section so it may be included in the Ground Water Monitoring and Closure Plan requirements. It should also be noted that the facility will seek a Part B for storage in a waste pile. A Corrective Action Order, along with issuance of their Part B permit, may be another route which should be considered. Reilly is awaiting IEPA's approval to allow construction of the new loading facility so resolution to this situation should be considered a priority.

MDG:cas/0306L

cc: Division File
cc: DLPC - Collinsville
cc: Tom Powell - OEM/Collinsville
cc: OEM - Springfield
cc: Ken Liss
cc: Todd Rowe

PERM. Section
GAC:cm
BB 10/27/87

DATE: August 6, 1987

TIME: 11:48 a.m.

I.D. 1190400006

Madison County

Granite City/Reilly Tar & Chemical

PHOTOGRAPH TAKEN TOWARD THE:

Northwest

ROLL# 720 PHOTO# 7

PHOTOGRAPH BY:

Michael D. [Signature]



DATE: August 6, 1987

TIME: 11:48 a.m.

I.D. 1190400006

Madison County

Granite City/Reilly Tar & Chemical

PHOTOGRAPH TAKEN TOWARD THE:

North

ROLL# 720 PHOTO# 8

PHOTOGRAPH BY:

Michael D. [Signature]



DATE: August 6, 1987

TIME: 11:49 a.m.

I.D. 1190400006

Madison County

Granite City/Reilly Tar & Chemical

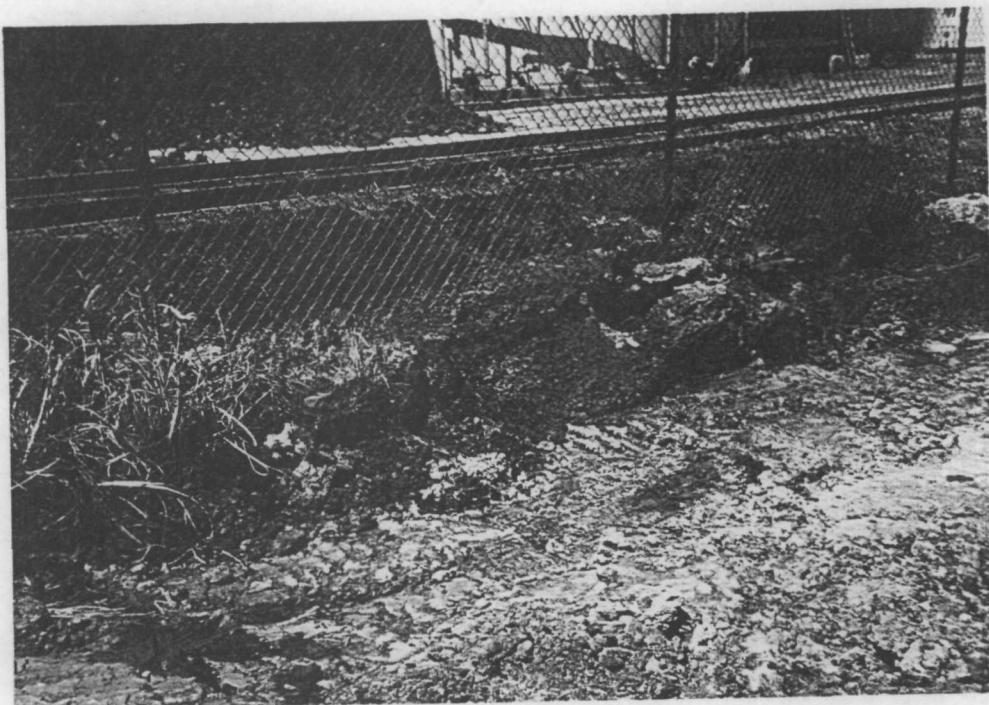
PHOTOGRAPH TAKEN TOWARD THE:

West

ROLL# 720 PHOTO# 9

PHOTOGRAPH BY:

[Signature]



DATE: August 6, 1987

TIME: 11:52 a.m.

I.D. 1190400006

Madison County

Granite City/Reilly Tar & Chemical

PHOTOGRAPH TAKEN TOWARD THE:

Northwest

ROLL# 720 PHOTO# 10

PHOTOGRAPH BY:

[Signature]



DATE: August 6, 1987

TIME: 11:55 a.m.

I.D. 1190400006

Madison County

Granite City/Reilly Tar & Chemical

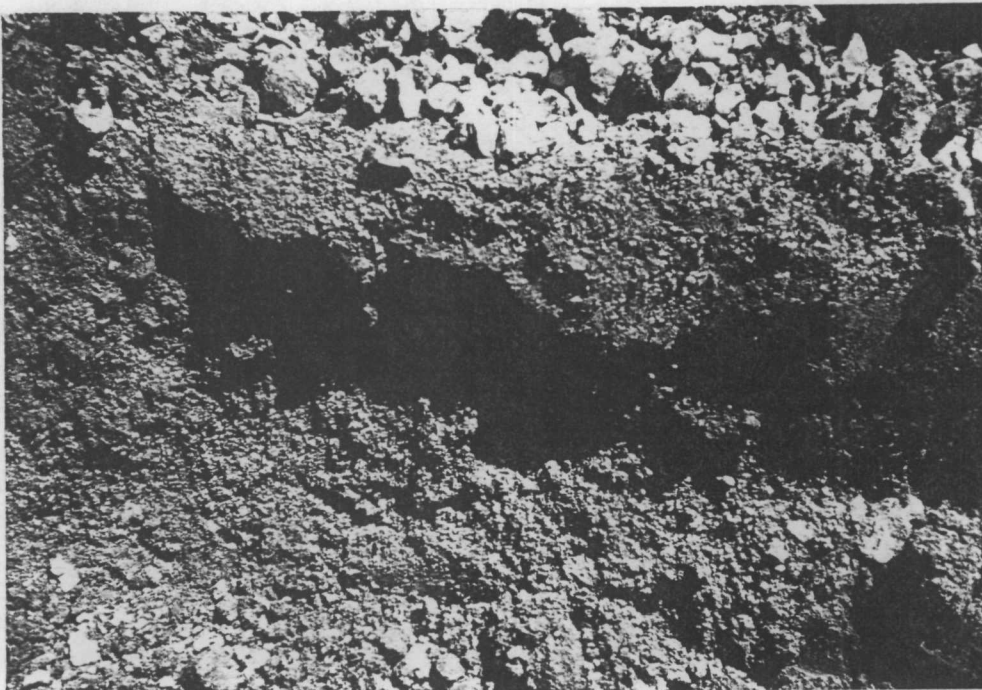
PHOTOGRAPH TAKEN TOWARD THE:

North, Northeast

ROLL# 720 PHOTO# 11

PHOTOGRAPH BY:

Willis



DATE: August 6, 1987

TIME: 11:55 a.m.

I.D. 1190400006

Madison County

Granite City/Reilly Tar & Chemical

PHOTOGRAPH TAKEN TOWARD THE:

North

ROLL# 720 PHOTO# 12

PHOTOGRAPH BY:

Willis



DATE: August 6, 1987

TIME: 12:02 p.m.

I.D. 1190400006

Madison County

Granite City/Reilly Tar & Chemical

PHOTOGRAPH TAKEN TOWARD THE:

East

ROLL# 720 PHOTO# 13

PHOTOGRAPH BY:

W. L. 20



DATE: August 6, 1987

TIME: 12:02 p.m.

I.D. 1190400006

Madison County

Granite City/Reilly Tar & Chemical

PHOTOGRAPH TAKEN TOWARD THE:

East, Southeast

ROLL# 720 PHOTO# 14

PHOTOGRAPH BY:

W. L. 20



DATE: August 6, 1987

TIME: 12:02 p.m.

I.D. 1190400006

Madison County

Granite City/Reilly Tar & Chemical

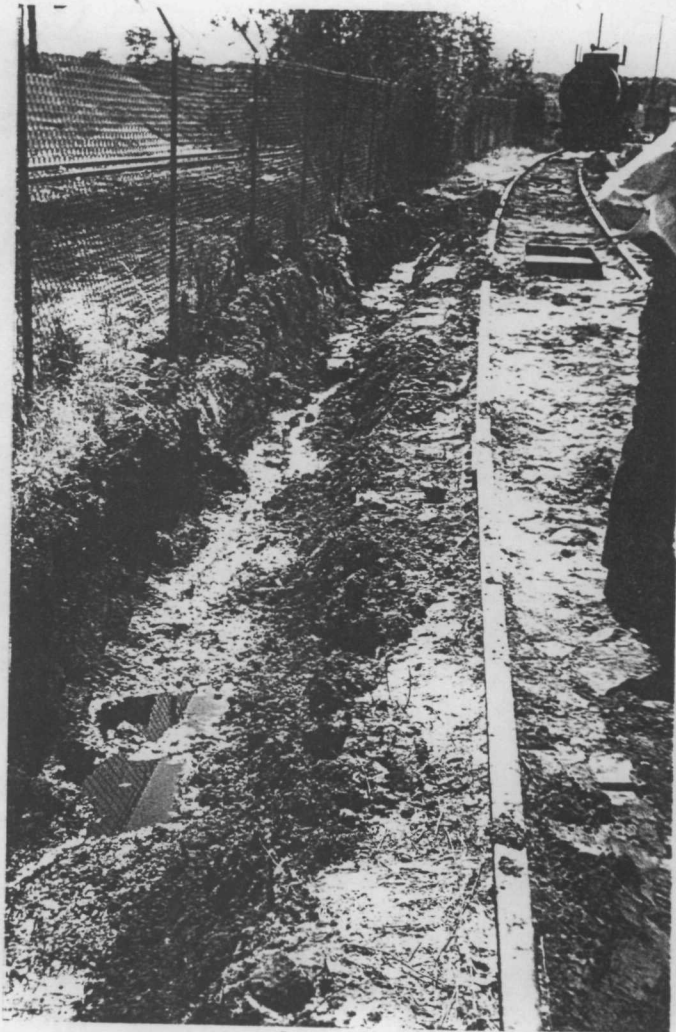
PHOTOGRAPH TAKEN TOWARD THE:

Southeast

ROLL# 720 PHOTO# 15

PHOTOGRAPH BY:

[Signature]



DATE:

TIME:

I.D.

County

PHOTOGRAPH TAKEN TOWARD THE:

ROLL# PHOTO#

PHOTOGRAPH BY:

INSPECTION REPORT

IEPA Number: 1190400006

Street: 19th + Edwardville Road P.O. Box 370

City: Granite City

Telephone: 618/452-3141

County: Madison

State: Ill

Zip Code: 62040

Type of Facility: Notified As: *(E/TS)*

Regulated As: *E/S*

LEF? yes no HPV? yes no 90 Day Follow-up Required? yes no

Region: 6 Date of Inspection: 8/6/87

From: 11:15 to 12:30

Weather (LDF Only):

Type of Inspection

ISS: Sampling: Citizen Complaint: Closed: Withdrawal:

Record Review: Follow-up to Inspection of : Other: X

Ncr. Regulated Status

Small Quant. Gen.: Claimed Nonhandler: Other (Specify in narrative): *Investigations*

Notified As/Regulated As Matrix Number: Key Letter:

Notification date, _____, from initial _____ or subsequent notification.

Part A date, _____, from initial _____ or amended _____ Part A.

Part B permit application submitted? yes no

Has the firm been referred to: USEPA? yes no ; IAG? yes no ; County

States Attorney? yes no . Date of referral to USEPA: _____, _____.

IAG: _____, County States Attorney: _____.

Federal Court Order Issued:- State Court Order Issued:

USEPA Compliance Order Issued: Illinois PCB Order Issued:

TSD Facility Activity Summary

[illegible]

[illegible]